

MEMORANDUM

CH2MHILL

Response to VDEQ Comments on the Draft Annual 2004 Long-Term Monitoring Report for Four Sites

TO: Mr. Garwin Eng/VDEQ
COPIES: Ms. Winoma Johnson/NAVFAC MIDLANT
FROM: Holly Rosnick/CH2M HILL
DATE: April 27, 2005

Below is the response to Virginia Department of Environmental Quality on the *Draft Annual 2004 Annual Long-Term Monitoring Report (Draft Annual LTM Report) for Four Sites: Naval Station Norfolk, Norfolk, Virginia*. The responses to the comments will be incorporated in the Final Annual 2004 Long-Term Monitoring Report.

Comment 1. Pages 2-1, 3-1, 4-1, and 5-1

The **Background** discussions indicate that the Long-Term Monitoring Plans for these sites will be updated in the fall of 2004. Please revise the date for the submittals to show current projections.

Response: The Long-Term Monitoring Report will be revised to more accurately reflect the update of the LTM Plan.

Comment 2. Section 2.5, paragraph 5, last sentence, page 2-7

This section refers to a "synoptic" round of water level data collection. The scientific use of the term "synoptic" is usually in reference atmospheric conditions and data. Please clarify the meaning of the term as used in this case.

Response: The meaning of "synoptic" in this document is not limited to atmospheric or weather conditions but associated with relating to or displaying conditions as they exist simultaneously over a broad area.

Comment 3. Section 3.6, page 3-5

This section recommends discontinuing sediment LTM sampling on the basis that no statistically significant changes have been observed in contaminant levels since the completion of remedial actions at the site. However, the Department is concerned that levels of lead that are above the 218 mg/kg cleanup level are still being observed (although inconsistently and sporadically) in the sediment. Therefore, the Department does not concur with the recommendation to discontinue sediment monitoring at this time. For the purposes of revising and finalizing the *Draft LTM Report*, the Department suggests replacing the recommendation for discontinuation of sediment

LTM sampling with a short description of the ongoing discussions of this issue within the NSN Partnering Team.

Response: The sediment monitoring is currently under review by the Naval Station Norfolk Partnering Team. The discussion on the sediment sampling will be revised to reflect the resolution reached by the Team , if determined before completion of the final report. If resolution is not reached before submittal of the final report, the above recommendation will be incorporated, but will also include discussion that reflects the strategy detailed in the Final ROD for this site.

Comment 4. Section 4.3, 1st bullet, last sentence

The Department suggests that the underlined text be included in order to clarify the sentence, "... or decreasing trend during the four additional rounds of LTM, then the system will"

Response: This comment will be incorporated in the text.